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January 23, 2021

Via ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Conti v. Doe*, Case No. 17-CV-9268 (VEC) (RWL)

Your Honor:

I am a principal of Judd Burstein, P.C., counsel for Plaintiff/Counterclaim-Defendant Dr. Paul M. Conti ("Dr. Conti"). I write pursuant to the Court's Individual Rule 5.A and Paragraph 13 of the Confidentiality Order in this matter respectfully to request permission to temporarily file under seal the documents filed in opposition to Defendant/Counterclaim-Plaintiff John Doe's motion for summary judgment and in support of Dr. Conti's cross-motion for summary judgment. I apologize for the lateness of this letter, but our firm is working remotely and is experiencing severe technical difficulties with our internet server, which delayed our ability to finalize these papers. Our submission includes information that was designated "Confidential" by Doe and certain non-parties pursuant to the Stipulated Confidentiality Agreement and Protective Order entered in this case. (Dkt. No. 44). Therefore, in an abundance of caution so as not to file publicly material that a party or non-party might later contend should have been filed under seal, I respectfully request that we be granted leave to file Dr. Conti's papers under seal temporarily and to file papers with appropriate redactions by Tuesday, January 26th.

Respectfully,

/s/ Peter B. Schalk
Peter B. Schalk

CC: All counsel of record (via ECF)